

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

ANNA L. MIRANDA, *on behalf of herself and all
others similarly situated*,

Plaintiff,

v.

CACH LLC and DANIELS NORELLI SCULLY
& CECERE, P.C.

Defendants.

**DECLARATION OF DANIEL A.
SCHLANGER IN SUPPORT OF
PLAINTIFF'S MOTION TO
AMEND COMPLAINT**

Index No.: 15-CV-0627

Hon. Lawrence E. Kahn

Hon. Daniel J. Stewart

DANIEL A. SCHLANGER, an attorney duly licensed to practice law in the State of New York, hereby declares, pursuant to 28 U.S.C. § 1746, that the following facts are truthful:

1. I am a partner at Kakalec & Schlanger & Schlanger, LLP, counsel for Plaintiff, Anna L. Miranda.
2. I make this Affirmation in support of Plaintiff's Motion for Leave to Amend Complaint.
3. Specifically, I make submit this affirmation for the purpose of placing before this Court Plaintiff's proposed Amended Complaint, which is attached hereto as Exhibit 1.
4. The facts and legal arguments relevant to this Motion have been set out in Plaintiff's Memorandum of Law.
5. For the reasons set forth more fully in Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Leave to Amend Complaint, Plaintiff's Motion should be granted in its entirety.
6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

April 25, 2016

Respectfully Submitted,

s/Daniel A. Schlanger

Daniel A. Schlanger, Esq. (519417)

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